

EXHIBIT B

In the Matter Of:

STACEY WOLKING and DARYL WOLKING vs

HENRY LINDNER, M.D., et al.,

COURTNEY YOUNG, PHARMA.D

April 03, 2024



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1 A Stacey Wolking.

2 Q I'm showing you Page 2 of Exhibit 2.
3 Do you see in the upper left-hand corner where
4 it says "E-Prescription"?

5 A Yes.

6 Q Can you explain what that means?

7 A It's an electronic prescription.

8 Q What does it mean for a prescription
9 to be electronic?

10 A That the provider sent it to our
11 electronic system, you know, it was not phoned
12 in, it was not faxed in, it was not
13 handwritten. Those are the other options.

14 Q Is that done by email or what sort
15 of system is used for an e-prescription to be
16 sent to Tunkhannock Compounding Center?

17 A I believe there's several different
18 types of systems. We use Surescripts. I
19 don't know what other providers use. I know
20 there are several options for e-prescribing,
21 different companies.

22 Q Going back to Page 1, with respect
23 to these four prescriptions that you see here,
24 does Tunkhannock Compounding Center possess

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1 any record of any communication about one of
2 these prescriptions between Dr. Lindner and a
3 Tunkhannock Compounding Center staff member?

4 MS. KEESLER: Objection to
5 form.

6 A No.

7 MS. DeNAPLES: Are you guys
8 hearing something in the background?

9 MR. LAMB: I am. I assume that
10 was on Courtney's end, is that right, are
11 there other people behind you again?

12 THE WITNESS: Yes. I
13 apologize.

14 MR. LAMB: It's okay for me so
15 far. But for the stenographer, let us
16 know if you're having a hard time.

17 THE COURT REPORTER: It seems
18 to be getting a little louder, but we'll
19 see.

20 BY MR. LAMB:

21 Q With respect to these four
22 prescriptions on Page 1 of Exhibit 2, does
23 Tunkhannock Compounding Center possess any
24 record showing that a conversation took place

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1 where we were, wanted to speak with
2 Dr. Lindner about the prescription. So then
3 we verified, you know, what his plans kind of
4 were, his thought process, you know. He
5 verified that he wanted the prescription
6 filled, he knew about it, you know, knew about
7 the duplicate therapy that she was already on,
8 she was no longer taking that I guess was my
9 understanding, you know, could have been a
10 thought process in my head at that point. And
11 that he, you know, again, verified with the
12 doctor, he wanted this prescription filled for
13 the amount. So then I filled the
14 prescription.

15 Q With respect to the conversation
16 that you just described with Lindner, do you
17 know which date that conversation took place?

18 A I don't remember. And I honestly
19 don't remember if it was me that spoke with
20 him. I don't know if it was Brian that spoke
21 with him. You know, it was either we had
22 spoke with him about it, and so I don't
23 remember exactly the date, the time, if it was
24 this exact prescription, you know, I don't

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1 pharmacists make an offer of counseling every
2 time they dispense a prescription?

3 A Yes.

4 Q Does Tunkhannock Compounding Center
5 record a patient's response to the offer of
6 counseling?

7 A I do not for patients that we're
8 mailing for, and I don't know if our system
9 allows, like has an option for that.

10 Q Okay. I think you mentioned a few
11 minutes ago that sometimes you write down
12 something about the counseling conversation
13 with the patient. Did I hear that correctly?

14 A If I give it and write it in a
15 patient note, sometimes I do that. It's more
16 for, I would say like an example would be, we,
17 you know, the patient picked to use maybe
18 syringes for their cream but they would like
19 to maybe try a clicker device next time, I
20 would say "Check with patient to see if they
21 would rather a clicker device" or "See how the
22 syringes are going." That's more kind of like
23 a courtesy for a patient that we're kind of
24 checking in on them again to see how

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1 you filled?

2 MS. KEESLER: Objection to
3 form.

4 A I don't remember.

5 Q Are you aware of the requirement
6 that the pharmacist shall document the refusal
7 of a patient or caregiver to accept
8 counseling?

9 MS. KEESLER: Objection to
10 form.

11 A I know that when patients come in,
12 it's documented on the screen.

13 Q Does --

14 A But that that would be like a
15 refusal or exception of counseling.

16 Q Does Tunkhannock Compounding Center
17 have any record showing that Stacey Wolking
18 ever refused to accept counseling?

19 A I don't think so.

20 Q I'm going to ask you some questions
21 about reference materials. In August of 2022
22 were there any physical books in the
23 Tunkhannock Compounding Center that a
24 pharmacist could use to check dosage